

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA

_____)	
TYLER TECHNOLOGIES, INC.,)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:20-cv-00173-TWP-DML
)	
LEXUR ENTERPRISES INC., ROBERT FRY,)	
AND JOHN DOES 1-100)	
)	
Defendants.)	
_____)	

JOINT MOTION FOR PROTECTIVE ORDER

Plaintiff, Tyler Technologies, Inc., and Defendants, Lexur Enterprises, Inc. and Robert Fry, by counsel, pursuant to Fed. R. Civ. P. 26(c)(1), hereby submit the attached proposed Joint Stipulated Protective Order (“Joint Protective Order”), and in support of the entry of the Joint Protective Order state:

1. In the course of discovery in this action, the Parties may be required to produce information that constitutes, in whole or in part, protected information such as trade secrets, non-public research and development, commercial or financial information, or other information that may cause harm to the producing party or a non-party.
2. For this reason, the Parties agreed to submit a Joint Protective Order to the Court.
3. The Parties now submit the proposed Joint Protective Order for approval by the Court in the form attached hereto as *Exhibit 1*.

WHEREFORE, the Parties, by counsel, respectfully request that the Court approve and “So Order” the proposed Joint Protective Order, which is attached hereto as *Exhibit 1*.

Dated: May 6, 2021

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Dated: May 6, 2021

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Dated: May 6, 2021

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By /s/ Douglas B. Bates
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CERTIFICATE OF SERVICE

I hereby certify that on May 6, 2021, a copy of the foregoing was filed electronically. Service of this filing will be made on all ECF-registered counsel by operation of the court's electronic filing system. Parties may access this filing through the court's system.

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